

EXHIBIT G

DECLARATION OF CHERYL PASTEUR

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

Baltimore County Branch of the
National Association for the
Advancement of Colored People, *et al.*,

Plaintiffs,

v.

Baltimore County, Maryland, *et al.*,

Defendants.

Civil Action No. LKG-21-3232

DECLARATION OF CHERYL PASTEUR

1. I, Cheryl Pasteur, am over 18 years old and am competent to testify. I submit this declaration upon personal knowledge in support of Plaintiffs' motion for preliminary injunction in this matter.

2. I am a Black registered voter residing in Baltimore County, Maryland.

3. I currently serve as the Vice Chair of the Baltimore County Public Schools Board of Education. I have been an educator in Baltimore City and County for over 36 years. In Baltimore County, I have been a classroom English teacher, an English department chair, a specialist in the Equity Office, and assistant principal at G.W. Carver Center for the Arts and Technology, Sudbrook Middle Magnet, and Randallstown High School. I served as the principal at Old Court Middle School and Randallstown High School. I was also an FBI agent from 1983 to 1988. I have taught at both the University of Pittsburgh and Morgan State University.

4. In 2018, I ran for and was elected to the Board of Education from councilmanic District 2. My opponent in the race was Anthony Glasser. As explained further below, Dr. Glasser essentially did not mount a campaign.

5. Prior to 2018, all Board of Education members were appointed by the Governor. Although I had been recommended for the position twice, I was never appointed. The decision was made in 2018 to make seven board seats elected positions, one for each County Council district.

6. To my knowledge, Dr. Glasser did not have substantial experience in education, nor did he claim any such experience during the campaign. He was an optometrist at the time he ran for the board.

7. Over the course of the election cycle, I raised and spent approximately \$5,000 for my campaign for the County School Board. According to his campaign finance reports, Dr. Glasser raised and spent \$0 on his campaign. The relevant report is attached as Exhibit 1.

8. During the campaign, four candidate forums were held for community members to meet the candidates and hear them speak. I attended all four; Dr. Glasser attended only one. At that one, which was the one held in my community, I spoke first at some length, after which Dr. Glasser said little more than that he agreed with me. There were also a number of other community meetings and “citizens’ nights out.” I attended several; I am unaware of any Dr. Glasser attended.

9. We distributed hundreds of pieces of literature describing my background and commitment to Baltimore County Public Schools. I canvassed numerous neighborhoods in the district, often with the support of other elected and campaign officials. Having taught and lived in the area for decades, I was able to find numerous places in the areas around Old Court and Winands Roads, which are more heavily populated by African Americans, to place signs. I was also able to place signs in two locations in the Greenspring Valley area. My signs were the only ones I recall seeing for the second district’s school board representative.

10. The Teacher's Association of Baltimore County (TABCO) held scheduled interviews for interested candidates in order to select which candidates it would endorse. I attended this interview and received TABCO's endorsement. Dr. Glasser did not attend the interview.

11. The Baltimore Sun sent out an editorial questionnaire to all candidates running in the Board election. I provided answers to all questions; to my knowledge, Dr. Glasser did not respond to the questionnaire. I received the Sun's endorsement.

12. I recruited and coordinated over 200 volunteers over the course of my campaign. Many of these volunteers were my former students, some from as far back as when I first started my teaching career in the 1970s. To my knowledge, there were no volunteers for Dr. Glasser until election day and few if any then.

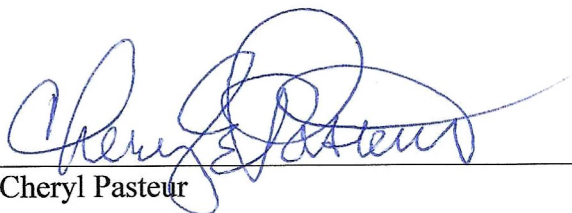
13. Because there were only two candidates for the Board from District 2 at the time of the primary, we were not on the ballot until the general election. This fact did not deter me from campaigning every day, door-to-door, leading up to the primary and between the primary and the general elections (with a fractured ankle). I was constantly thinking that I had to campaign harder than my opponent regardless of my credentials. I was exceedingly appreciative of any support I received. My volunteers came out to make sure I had a chance of winning. The final result literally brought me to my knees, because my team and I were not sure that, at the end, my experience and commitment would be enough.

14. My experiences on the Board have demonstrated my resilience and commitment to the children of Baltimore County. I survived the battering I endured (primarily from white people from outside of the district) while campaigning and during my three years on the Board. I am proud to have represented District 2 on the school board for the past three years.

15. As an educator and as a member of the County School Board, I have frequently heard parents on the west side of the County, where the student population is much more heavily Black than in the rest of the County, say that they feel neglected by the County Schools and the County government. I believe that is in part a result of the County's history of racism and because of ongoing racism. This racism is countywide and must be faced head on if we want better!

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on February 5, 2022


Cheryl Pasteur

PASTEUR DECLARATION

EXHIBIT 1



Name of Entity : Glasser, Anthony Citizens for

Entity Number : 01012701

Filing Period Name : 01/09/2019 Annual

Report Due Date : 01/16/2019

Campaign Finance Report Summary Sheet**Part 1**Transaction Period → This Report covers transactions beginning 02/26/2018 and ending 01/09/2019 .
Date Date

- ☒ Final Report (Check if you intend to close the account. This cannot be a final report if a cash balance or outstanding obligation remains)
- ☐ Amendment # _____ (Date amendment is being filed _____ .)

Part 2**Electoral**

Bank Account Name	Bank Account Number	Bank Account Balance*
*As of the report transaction ending date. Total		\$0.00

Part 3**Receipts**

Contributions – Schd 1, Col A	\$0.00
Ticket Purchases – Schd 1, Col B	\$0.00
Federal Committees – Schd 1, Col C	\$0.00
Political Clubs – Schd 1, Col D	\$0.00
MD Candidate and Slate Accounts – Schd 1A, Col E	\$0.00
MD Party Central Committees – Schd 1A, Col F	\$0.00
MD Political Action Committees – Schd 1A, Col G	\$0.00
Non-Federal Out-of-State Committees – Schd 1A, Col H	\$0.00
Other – Schd 1B, Col I	\$0.00
Loans – Schd 3, Col K	\$0.00

Enter Total in Part 4 (Total Receipts)

Expenditures

Salaries & Other Compensation – Schd 2, Col N	\$0.00
Rent & Other Office Expenses – Schd 2, Col O	\$0.00
Field Expenses – Schd 2, Col P	\$0.00
Media – Schd 2, Col Q	\$0.00
Printing & Campaign Materials – Schd 2, Col R	\$0.00
Direct Mailing by Mail House – Schd 2, Col S	\$0.00
Postage – Schd 2, Col T	\$0.00
Purchase of Equipment – Schd 2, Col U	\$0.00
Fundraising Expenses – Schd 2, Col V	\$0.00
Transfers Out – Schd 2, Col W	\$0.00
Loan Repayment – Schd 2, Col X	\$0.00
Other – Schd 2, Col Y	\$0.00
Returned Contribution – Schd 2, Col Z	\$0.00

Enter Total in Part 4 (Total Expenditures)

■ Current ■ Amended ■ Deleted

Failure to provide all the information required by this form will be regarded as a **FAILURE TO FILE**.



Name of Entity : Glasser, Anthony Citizens for

Entity Number : 01012701

Filing Period Name : 01/09/2019 Annual

Report Due Date : 01/16/2019

Part 4

Prior Balance	<input type="text" value="\$0.00"/>	Report calculated cash balance from Part 4 of your prior report.
	+	
Total Receipts	<input type="text" value="\$0.00"/>	Total of Part 3 Receipts
	-	
Total Expenditures	<input type="text" value="\$0.00"/>	Total of Part 3 Expenditures
	=	
Cash Balance	<input type="text" value="\$0.00"/>	This is your report calculated cash balance. Carry forward this balance to your next report.

Part 5

Value of In-Kind Contributions – Schd 1B, Col J	\$0.00
Value of In-Kind Expenditures – Schd 2, Col AA	\$0.00

Part 6**Administrative**

Outstanding Loan Balance – Schd 3, Col L	\$0.00
Outstanding Bills Due – Schd 3, Col M	\$0.00
Total Outstanding Obligations	\$0.00

Electoral

Outstanding Loan Balance – Schd 3, Col L	
Outstanding Bills Due – Schd 3, Col M	
Total Outstanding Obligations	\$0.00

Part 7

Under penalty of perjury, we declare that we have examined this report, including the accompanying schedules, and to the best of our knowledge and belief they are complete and accurate.

(Date) 01/17/2019

Signature of Treasurer

GLASSER, ANTHONY M

(Date) 01/17/2019

Signature of Chairman

Warning

Failure to provide all information required by this form will be regarded as a failure to file.

Amendments Summary

Report No	Filed date	Report Type	Filer
1	01/17/2019	Original	GLASSER ANTHONY M

■ Current ■ Amended ■ Deleted

Failure to provide all the information required by this form will be regarded as a **FAILURE TO FILE**.